

1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
4 DISTRICT COURT at Seattle, Washington.

5 JANUARY 25 2023
6 By Ravi Subramanian, Clerk
7 J. S. Deputy
8

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10 UNITED STATES DISTRICT COURT FOR THE
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE
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14
15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18 ABRAHAM MBUGUA,
19 Defendant.
20

21 NO. **CR23-009 RSM**
22
23 **INDICTMENT**

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25 The Grand Jury charges that:

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COUNT 1

27
(Unlawful Possession of a Firearm)

28 On or about January 11, 2023, in King County, within the Western District of
29 Washington, ABRAHAM MBUGUA, knowing he had been convicted of the following
30 crime punishable by a term of imprisonment exceeding one year: *Unlawful Possession of*
31 *a Firearm*, in King County Superior Court, under case number 18-1-02685-3, on or about
32 September 21, 2018, did knowingly possess, in and affecting interstate and foreign
33 commerce, a firearm, that is, a Glock 19 9mm semiautomatic pistol and a Smith and
34 Wesson M&P Shield 9mm semiautomatic pistol, both of which had been shipped and
35 transported in interstate and foreign commerce.

36 All in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the offense alleged in Count 1, ABRAHAM MBUGUA shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and associated ammunition that were involved in the offense, including but not limited to, the following firearms and any associated ammunition seized from 325 Westlake Avenue N, #305, Seattle, Washington, on or about January 11, 2023:

- a. One Glock 19 9mm semiautomatic pistol and any associated ammunition; and
 - b. One Smith and Wesson M&P Shield 9mm semiautomatic pistol and any associated ammunition.

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or,
 - e. has been commingled with other property which cannot be divided without difficulty:

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

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5 A TRUE BILL:
6 DATED: *January 25, 2023*
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8 *Signature of Foreperson redacted pursuant
to the policy of the Judicial Conference of
the United States.*
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12 FOREPERSON
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NICHOLAS W. BROWN
United States Attorney

VINCENT T. LOMBARDI
Assistant United States Attorney